

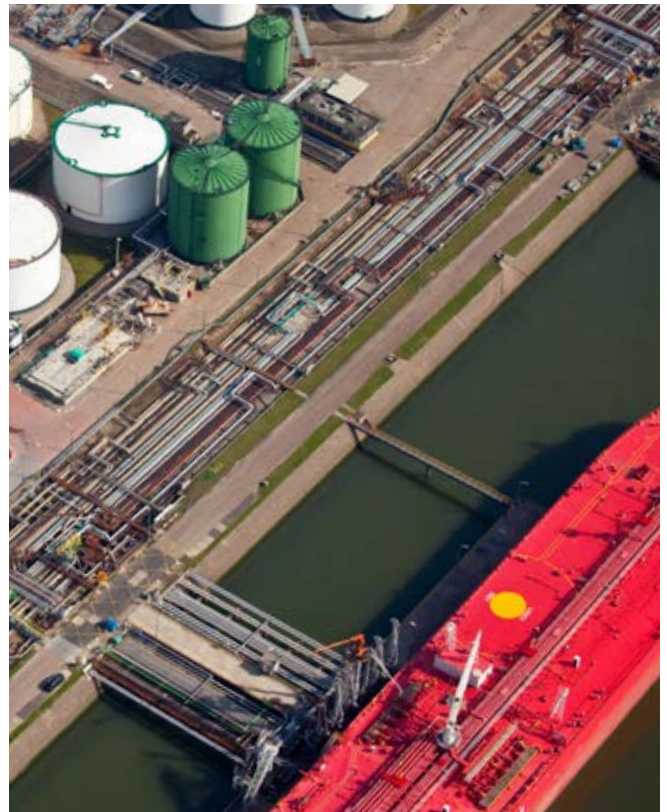
2022 UPEI ANNUAL REPORT

ADVANCING THROUGH THE STORMS

60TH
ANNIVERSARY

UPEI represents European importers and wholesale/retail distributors of energy for the transport and heating sectors, supplying Europe’s customers independently of the major oil companies and energy producers.

Independent suppliers, most of which SMEs, cover more than a third of Europe’s demand and play a crucial role in an evolving market by bringing competition which is vital to the economy. Their independence enables them to respond rapidly to changes in terms of market structure, products, and services, contributing to security of supply on a local, national and European levels while embracing new, cost-effective solutions which further promote energy efficiency and reduce pollutants and emissions.



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PRESIDENT'S FOREWORD



The year 2022 was a year of storms through which UPEI kept advancing its agenda, building on 60 years of experience of accompanying its members and partners through major crises.

Indeed, by end 2021, the COVID 19 pandemic was finally brought under control and the strong economic recovery was helping to support the EU and the world's adaptation to accelerated global challenges, notably climate change and increased threats to the environment. But, on 24 February 2022, the Russian leadership decided otherwise by attempting to invade Ukraine, provoking the most serious geopolitical crisis in Europe since World War II, a deep energy crisis, and a general disruption of the post-war world order and principles.

The European Union (EU) and the United Kingdom, alongside their allies, in particular the United States and the other G7 countries as well as Switzerland, had to take very bold decisions by imposing economic sanctions to Russia, particularly in areas of direct concern to UPEI members. The EU in 2021 imported from Russia 25% of its crude oil, 39.5% of its gas and 39% of its solid fuels (coal), In the last months of 2022 the figures had decreased to 20%, 20% and 25.5% respectively¹. These figures however do not show the wide diversity of individual Member States' level of dependency on Russian energy and the more acute difficulties faced by several of them. The EU had to massively re-organise its sources of energy provision and reduce its consumption by adopting energy saving measures. This was not enough to calm the energy markets, and the huge

surge in energy prices - contributing to a high inflation rate - that had started end 2021, continued to dominate the energy debates throughout the year.

In a press statement adopted in the framework of our Spring General Meeting 2022, we agreed that *"the crisis accelerated the need for the European Union and its partners in Europe to drastically reduce their dependency on fossil fuels imported from Russia and to maximise their*

pressure on the Russian regime to stop the invasion." However, our members were confronted with a patchwork of national measures aiming at supporting consumers and companies with the payment of their hugely increased energy bills. Some Member States adopted measures which did not make any difference between producers and distributors of fuel products or created tensions at their national borders. UPEI developed a position paper in September, insisting that national measures should bear in mind the coherence of the EU Internal Market and exclude contributions on turnover of companies which do not benefit from surplus profits, which is the case of independent companies without refining capacity, purchasing from the international market and from local refineries, in both cases at inter-

national prices. We also recalled that companies without refining capacity have to increase their fixed assets to maintain the same sales volume.

Meanwhile, the legislative front remained very active with the examination of the "Fit for 55" legislative package both by the EU Council under French and Czech Presidencies and the European Parliament. The Commission also issued new legislative proposals (Euro 7, CO2 standards for heavy duty vehicles, ...) and a comprehensive plan to address the energy crisis (REPowerEU). On "Fit

«
"2022 has been an extremely challenging year for UPEI members, who had to fight on the short-term front of the energy crisis and the profound changes brought by the sanctions against Russia, while at the same time continuing to promote our longer-term solutions for a sustainable energy system towards policymakers reluctant to the concept of technology neutrality."
 »

¹ Source: [Euronews.Green](#) and Eurostat (Extra-EU imports which refers transactions with all countries outside of the EU)

for 55", a number of compromises were reached within each institution and several trilogue negotiations started between them, but they led to very few final agreements, except on the revision of the Emission Trading Scheme (ETS). UPEI very actively contributed to these legislative debates by issuing or co-issuing seven statements and six position papers covering the Energy Performance of Buildings Directive (EPBD), the Energy Taxation Directive (ETD), the Renewable Energy Directive (RED), the CO2 standards for light duty and for heavy duty vehicles, the future revision of the Oil Stocks Directive, and the Alternative Fuels Infrastructure Regulation (AFIR). Ahead of the revision of the Payment Systems Directive 2 (PSD2), we contributed to the public consultation issued by the European Commission during the summer. We also participated in a number of stakeholders or expert group meetings organised by the European Commission (Excise Duties Group, Oil Coordination Group, Trade Contact Group) and were invited to become a member of the Renewable and Low-Carbon Fuels Value Chain (RLCF) Industrial Alliance coordinated by the European Commission (DG MOVE). We continue to represent the independent fuel suppliers' community in as many European informal or formal coalitions as possible.

For UPEI, 2022 was also marked by elements of renewal and of continuity.

In terms of renewal, our association welcomed new Board members in January (Christian Heise of DCC Energi) and in April (Carsten Müller of Kuttenteuler, representing MEW), and a new Secretariat. Pierre Lucas succeeded Cécile Nourigat as Secretary General in February and José Luis Mira Mira replaced Alice di Pace as Office and Communication Manager in May. With the support of these renewed Board and Secretariat, I accepted to take over the Presidency of UPEI after the unexpected decision of our old friend and colleague Matthias Plötzke to leave us before the start of his mandate. Finally, we also started the year with the official recognition in the Belgian Official Journal of 6 January 2022 of the transfer of our seat from Paris to Brussels.

Continuity was expressed by the celebration of UPEI's 60th anniversary on the occasion of our Autumn General Meeting, splendidly hosted by our member DCC in Dublin. Indeed, UPEI was created in 1962 in Frankfurt am Main by the three national associations of Germany, Italy, and France, and incorporated the same year as an association of French law in Paris. Our Dublin event provided an opportunity to meet again with former UPEI Presidents Thierry de Meulder and Brian Worrall and Secretariat members in a warm and historical atmosphere, the Clontarf Castle.

But we also held a debate in Dublin on the review of our 2050 Vision that had been adopted in 2019. The review expressed our sector's analysis of the shocks that affected

our sector (COVID 19 pandemic and energy crisis following the invasion of Ukraine by Russia), our commitment to the EU 2030 and 2050 targets, and our expectations from the policymakers, particularly as regards the respect of technology neutrality, a support to existing infrastructure, our expectations from the revision of the Energy Taxation Directive (ETD) and our plea for the clarity and coherence of legislation. This document was finalised after our debate and widely distributed among EU and national policymakers as well as energy and transport industry stakeholders.

Perspectives for 2023 are mixed and, as I write this foreword in April 2023, I see some positive elements emerg-

ing: despite the on-going war in Ukraine with no perspectives for peace, the energy crisis has not completely overwhelmed our European economies, even if the winter 2023/24 is not secured yet. After months during which the EU policy-makers seemed to have definitely buried the concept of technology neutrality - together with the internal combustion engine - some hopes for a new debate came from Berlin at the very last moment regarding the revised CO2 standards for light duty vehicles: with the announcement by the German government that it will not vote in favour, a compromise was found that leaves - to a certain extent - the door open for alternative fuels.



"UPEI's Vision is to be by the time of its 100th anniversary in 2062 the association of choice for all stakeholders in the European independent fuel supply eco-system, by providing them with all necessary intelligence and networking opportunities to successfully operate in the carbon neutral economy and society."



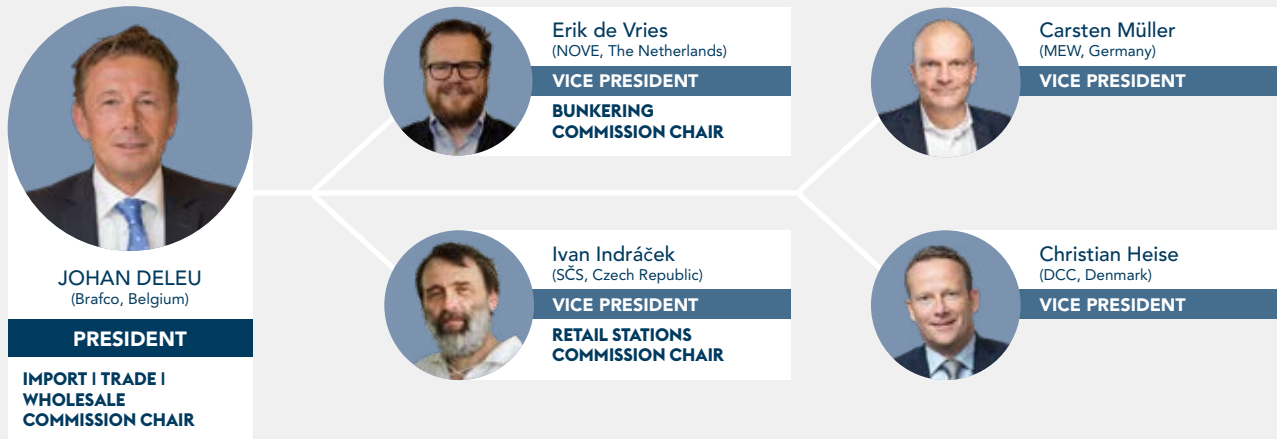
Johan Deleu



ABOUT UPEI

STRUCTURE OF UPEI

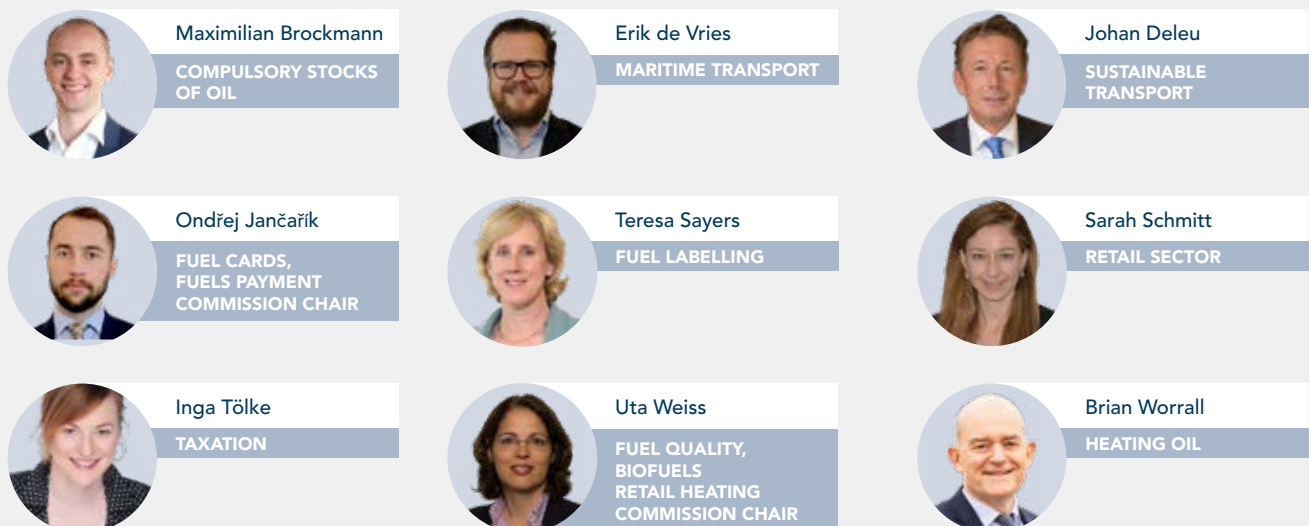
UPEI PRESIDING BOARD



UPEI SECRETARIAT



UPEI EXPERTS



UPEI COMMISSIONS

UPEI covers a wide spectrum of downstream activities. In order to address all the topics and issues identified at the business level by the membership, as well as policy developments at EU level that affect the business, five Commissions were created – one for each of the main business activities of UPEI membership.

BUNKERING COMMISSION



- Decarbonisation
- Fuel quality
- Sustainable fuels
- Taxation
- Emission Trading Scheme

2
MEETINGS

RETAIL HEATING COMMISSION



- Energy efficiency
- Building legislation
- Bio heating oil

4
MEETINGS
(JOINT HEATING COMMISSION)

IMPORT / TRADING / WHOLESALE COMMISSION



- Biofuels
- Compulsory stocks obligations
- Energy taxation
- Fuel quality
- Emission Trading Scheme

1
MEETING

RETAIL STATIONS COMMISSION



- Alternative fuels infrastructure
- Fuel labelling, blends and additives
- Technical regulations for stations
- Trends in retail sector

1
MEETING

FUEL PAYMENTS COMMISSION

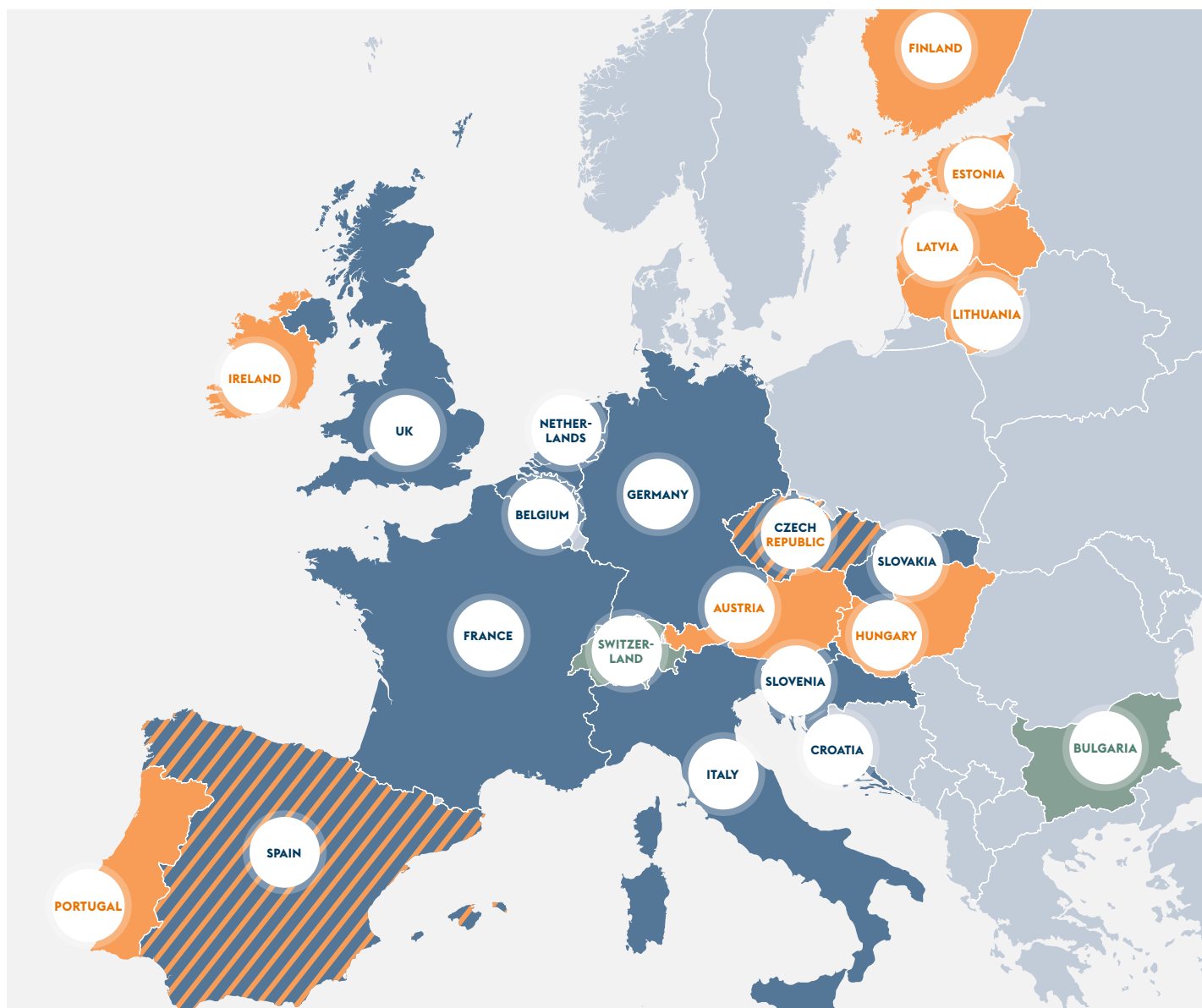


- Fuel cards and apps
- Payment services legislation
- Fraud
- Innovation
- Trends in the payment area

2
MEETINGS

= 10 commission meetings in 2022





NATIONAL ASSOCIATIONS

BELGIUM

Brafco - www.brafco.be

CROATIA

HUP - www.hup.hr

CZECH REPUBLIC

SČS - www.scs.cz

FRANCE

FFPI - www.ffpi.fr

GERMANY

MEW - www.mew-verband.de

ITALY

ASSOPETROLI – ASSOENERGIA
www.assopetroli.it

THE NETHERLANDS

NOVE - www.nove.nl

SLOVAKIA

SČSSR - www.scssr.sk

SLOVENIA

SNNK-WPC - www.world-petroleum.org

SPAIN

UPI - www.upienergia.es

UK

DFA - www.downstreamfuel.org.uk



COMPANIES

AUSTRIA

Stiglechner - www.stiglechner.com

CZECH REPUBLIC

W.A.G. Payment Solutions a.s.
www.eurowag.com

ESTONIA

Olerex AS - www.olerex.ee

FINLAND

SEO - www.seo.fi

HUNGARY

Mabanaft Hungary Kft - www.mabanaft.hu

IRELAND

DCC Energy Limited - www.dcc.ie

LATVIA

AS VIRŠI-A - www.virsia.lv

LITHUANIA

UAB Gelyvbe (Lithuania)
www.facebook.com/gelyvbe/

PORTUGAL

PRIO Energy - www.prio.pt/en/

SPAIN

OnTurtle - www.onturtle.eu/en/
Andamur - www.andamur.com



ASSOCIATES

BULGARIA

Benzin Bg - www.benzin.bg

SWITZERLAND

AVIA International
www.avia-international.com



CONTEXT

THE EU POLICY CONTEXT IN 2022

The EU energy policy agenda, heavily filled with the on-going legislative process for the adoption of the “Fit For 55” package, was further loaded on 24 February with the need for the immediate addition of an answer to the major geopolitical crisis provoked by the military invasion of Ukraine by Russia. Both the climate crisis and the energy crisis fully dominated the EU agenda throughout the year.

The European Council held a first emergency meeting on the day of invasion, with the participation of the President of Ukraine, followed by a second one on 24 March together

with the President of the USA, during which the main axes of the EU answer, particularly as regards energy, were defined.

These axes essentially consisted of a series of sanctions against Russia and its ally Belarus, including an embargo on Russian oil, a softening of the EU State Aid regime, a framework to guide Member States’ support to consumers and companies affected by high energy prices, and the adoption of a comprehensive plan aiming to end the EU’s dependence on Russian fossil fuels and to further tackle the climate crisis, “REPowerEU”.

SANCTIONS AGAINST RUSSIA

No less than 9 packages of sanctions were adopted by the EU Council between February and December.

They first affect individuals and specific economic entities, including travel bans, asset freeze and prohibition to provide funds.

For travelers, the EU’s Visa Facilitation Agreement with Russia was suspended, meaning that Russian citizens no longer enjoy privileged access to the EU and face a lengthier, more expensive, and more difficult visa application process. Moreover, Russian travel documents issued in or to persons who reside in Russian-occupied regions in Ukraine or breakaway territories in Georgia are no longer accepted as valid travel documents for obtaining a visa or crossing the borders of the Schengen area.

The sanctions also cover financial and business services, excluding key Russian banks from the SWIFT system. This measure stops these banks from conducting their financial

transactions worldwide in a fast and efficient manner. Moreover, the EU prohibits investing in projects co-financed by the Russian Direct Investment Fund. The provision of euro-denominated banknotes to Russia has also been banned.

In the energy sector, where the relations between the EU and Russia were very dense, sanctions affected in particular:

- » A ban on export of specific refining technologies, affecting the upgrade of Russian oil refineries and adding to the existing oil equipment ban from 2014 an import ban on all forms of Russian coal.
- » A ban on new investment across the Russian energy sector, with limited exceptions for civil nuclear energy and the transport of certain energy products back to the EU.
- » A complete import ban on all Russian seaborne crude oil and petroleum products and price caps on:
 - › export of Russian seaborne crude oil, fixed at a maximum price of 60 USD per barrel ;
 - › “premium-to crude” petroleum products, such as diesel, kerosene, and gasoline (maximum price of 100 USD) ;
 - › “discount-to-crude” petroleum products, such as fuel oil and naphtha, reflecting market dynamics (maximum price of 45 USD per barrel).
- » The prohibition on Russian nationals or entities from booking gas storage capacity in the Member States.

Also, the EU has ended the treatment of Russia as Most-Favoured-Nation within the WTO framework and excluded Russia from public contracts and EU programmes. Many of these sanctions were adopted in coordination with the G7 and other countries such as Australia.



SUPPORT TO MEMBER STATES AGAINST HIGH ENERGY PRICES

2022 was characterized by a massive increase in energy prices, which Member States attempted to address with various sorts of measures, not all in line with each other or consistent with the EU Internal Market. Upon proposal from the European Commission, the Council adopted a “Regulation on an emergency intervention to address high energy prices”. This Regulation consists of a mandatory temporary solidarity contribution on the profits of businesses active in the crude petroleum, natural gas, coal, and refinery sectors. The solidarity contribution is calculated on taxable profits, as determined under

national tax rules in the fiscal year starting in 2022 and/or in 2023, which are above a 20% increase of the average yearly taxable profits since 2018. The solidarity contribution will apply in addition to regular taxes and levies applicable in Member States.

Under the Regulation, Member States can keep national measures that are equivalent to the solidarity contribution, provided that they are compatible with the objectives of the Regulation and generate at least comparable profits.

STATE AID TEMPORARY CRISIS FRAMEWORK

The European Commission adopted in March 2022 a new State Aid Scheme, extended until 31 December 2023, to support companies directly or indirectly affected by the economic effects of the war in Ukraine. The framework includes an increase of the ceilings set out for limited amounts of aids, additional flexibility for liquid support

to energy utilities for their trading activities, an increase of the flexibility and support possibilities for companies affected by rising energy costs (subject to safeguards), new measures aimed at supporting electricity demand reduction, and a clarification of the criteria for the assessment of recapitalisation support measures.

REPowerEU PLAN

On 18 May, the European Commission presented a new energy plan, aiming at ending the EU's dependence on Russian fossil fuels and at further tackling the climate crisis. It should be supported by a €300 billion budget financed from the €225 billion unspent parts of the Recovery and Resilience Facility adopted in 2021 to fight the COVID-19 crisis, to which €20 billion in grants would be added from the sale of EU Emission Trading System allowances currently held in the Market Stability Reserve and €45 billion from other parts of the EU budget.

The plan consists of three major elements: promoting energy savings, diversifying European supplies of oil and gas and boosting renewables.

In terms of energy savings, the Commission proposed to enhance long-term energy efficiency measures, including an increase from 9% to 13% of the binding Energy Efficiency Target under the “Fit for 55” package.

In terms of diversification, the European Commission proposed an EU External Energy Strategy to facilitate energy diversification and building long-term partnerships with suppliers, including cooperation on hydrogen

or other green technologies and an EU Energy Platform, to facilitate voluntary common purchases of gas, LNG and (renewable) hydrogen by pooling demand, optimising infrastructure use and coordinating outreach to suppliers.

In terms of renewables, the Commission proposed to increase the 2030 target for renewables from 40% to 45% under the “Fit for 55” package, via a set of measures aiming at massively scaling-up and speeding-up renewable energy in power generation, industry, buildings, and transport. This includes:

- » A dedicated EU Solar Strategy to double solar photovoltaic capacity by 2025 and install 600GW by 2030, and a Solar Rooftop Initiative with a phased-in legal obligation to install solar panels on new public and commercial buildings and new residential buildings.
- » Measures to double the rate of deployment of heat pumps, and to integrate geothermal and solar thermal energy in modernised district and communal heating systems.
- » A Recommendation to tackle slow and complex permitting for major renewable projects, and a targeted amendment to the Renewable Energy Directive to recognise renewable energy as an overriding public interest.

» A Hydrogen Strategy, aiming at having 10 million tons of domestic renewable hydrogen produced and 10 million tons imported by 2030, to replace natural gas, coal and oil in hard-to-decarbonise industries and transport sectors. The funding would be provided by the next call for large scale projects from the EU Innovation Fund (budget of €3 billion) completed by a European Hydrogen Bank to be launched in 2023, that should bring more funding, and de-risk the market in Europe, both

for domestically produced and imported hydrogen.
 » A Biomethane Action Plan comprising a new biomethane industrial partnership and financial incentives to increase production to 35bcm by 2030, including through the Common Agricultural Policy.

On 14 December, the negotiators from the EU Council and the European Parliament reached an agreement on the “REPowerEU” plan.

“FIT FOR 55” PACKAGE

Under the French and then the Czech Presidency of the EU Council, each file of the “Fit for 55” package was examined by the relevant Committees in the European Parliament and working parties in the EU Council, leading for most of them to the adoption of negotiation mandates and the start of trilogue negotiations. Only the revision of the Energy Taxation Directive (ETD) was forwarded to the Swedish Presidency in 2023.

However, none of the texts was published on the EU Official Journal, nor even formally adopted by end 2022.

Outside the “Fit for 55” package, the Commission proposed in 2022 a Regulation on CO2 emission standards for heavy duty vehicles, and a Regulation on type-approval of motor vehicles (Euro 7).



EUROPEAN COMMISSION WORK PROGRAMME FOR 2023

The European Commission presented its work programme for 2023 on 18 October, titled "A Union standing firm and united". The Commission bases its programme on its analysis of three "realities" currently faced by the European Union: the need to act via a united approach to the multiplication of crises, the need to accelerate the radical transformation proposed at the beginning of the current legislature in 2019, and the need to provide EU citizens with fast reactions both to anticipate future challenges and answer to the most pressing requirements, including the reduction of energy prices.

The work programme includes initiatives such as a legislative proposal on greening corporate fleets, the creation of an EU Hydrogen Bank, a targeted revision of the legislation on chemicals (REACH) and the revision of the Payments Service Directive (PSD).

Amongst the legislative proposals already presented, the Commission proposes to give priority to conclude the negotiations on those related to the "Fit for 55" package.

EUROPEAN COMMISSION WORK 2023 PROGRAMME

<div style="font-size: 48px; font-weight: bold; margin-bottom: 10px;">43</div> <p style="font-weight: bold; margin: 0;">NEW POLICY INITIATIVES</p>	<div style="display: flex; align-items: center; justify-content: center; margin-bottom: 10px;"> 8 </div> <p style="font-weight: bold; margin: 0;">INITIATIVES FOR REGULATORY SIMPLIFICATION</p>
<div style="display: flex; align-items: center; justify-content: center; margin-bottom: 10px;"> 2 </div> <p style="font-weight: bold; margin: 0;">PROPOSALS FOR WITHDRAWAL</p>	<div style="font-size: 48px; font-weight: bold; margin-bottom: 10px;">116</div> <p style="font-weight: bold; margin: 0;">PENDING PRIORITY PROPOSALS</p>





ACTIVITY REPORT

FACING CLIMATE CHANGE AND THE ENERGY CRISIS

In 2022, UPEI had to further amplify its advocacy activities, in order to follow up closely and contribute to the legislative process of adoption of the “Fit for 55” package, both in the European Parliament and the EU Council (under the French and Czech Presidencies), while at the same time monitoring the raft of energy-related measures undertaken by the EU to counteract the invasion of Ukraine by Russia and the subsequent energy crisis that directly affected our members.

In the context of this crisis materialised by a massive surge of prices, UPEI issued a position paper on the European Commission proposal presented in September 2022 for a Regulation “on an emergency intervention to address high energy prices”. UPEI members were particularly concerned by the proposed mandate for Member States to introduce a “temporary solidarity contribution” on surplus

benefits generated by the energy crisis for the oil, gas, coal and refinery sectors: while non-integrated companies were supposed not to be affected by this new contribution, Member States were allowed to complement the European contribution with broader national measures. UPEI proposed that a better definition of complementary national measures, excluding contributions on turnover of companies which do not benefit from surplus profits, should be included in the Regulation. This would contribute to maintaining the coherence of the Internal Market. UPEI also insisted that in the fuels sector, independent companies without refining capacity are purchasing from the international market and from local refineries, in both cases with reference to international prices. They are therefore victims and not beneficiaries of the soaring prices increase. Moreover, companies without refining capacity have to increase their fixed assets to maintain the same sales volume.

MAXIMISING STAKEHOLDERS’ COOPERATION

The EU energy stakeholders’ landscape is characterised by a large diversity, requiring strong information and cooperation tools to build - to the maximum extent - a consensus on major issues at stake during the EU legislative process. In 2022, UPEI was actively involved with the “Informal Coalition on Sustainable & Renewable Fuels”, the “Mobility for Prosperity in Europe” (MPE), the “Sustainable Mobility European Platform” and, created in 2022, an “Informal Coalition on Delegated Acts on RED II”. These groupings meet on a regular basis - sometimes weekly - to exchange views on current legislative developments and prepare common statements, or to interact with MEPs or EU officials.

UPEI is also a member of the Joint Heating Commission together with Eurofuels, Fuels Europe and the European Confederation of Fuel Distributors (ECFD), which met three times in 2022. More information on this Commission is provided below.



DEBATING AND DRAFTING POSITIONS IN THE COMMISSIONS



– ITW Commission

Chair: Johan Deleu

One online meeting was organised in June 2022, with a focus on the discussions on the “Fit for 55” package in the European Parliament and the EU Council and on the priorities of the Czech Presidency of the Council.

On the discussions on the revision of the Renewable Energies Directive (RED III), UPEI expressed its concern in a letter sent to the Czech Presidency and the European Parliament’s Rapporteur about the envisaged date of entry into force of the new text: the European Parliament had proposed to advance the phase out of the crop-based biofuels with high risk of indirect land use change (ILUC) to the date of the entry into force of the Directive (from the date initially foreseen for 2030). In its letter, UPEI warned against the implications of such a radical advancement of the date, while a majority of fuel suppliers have already entered commitments and supply contracts for 2023, which they ought to honour to avoid penalties, commercial damage and supply disruptions. UPEI called on the Czech Presidency to ensure that the Parliament’s amendment was duly reconsidered in the framework of the “trilogue” negotiations, in order to allow fuel suppliers to continue supporting transport’s decarbonisation in a legally certain framework and to remain competitive.

Still on RED III, UPEI adopted with the Federation of European Tank Storage Associations (FETSA) a joint position paper ahead of the vote in the ENVI Committee of the European Parliament, insisting that a greater use of renewables should be encouraged, including through ambitious sub-targets, and that some unjustified restrictions should be addressed. The position included a support to a set of proposed amendments concerning an increase in the GHG intensity reduction target in the transport sector, provided that it is supported by higher shares of sustainable biofuels, synthetic fuels and other low-carbon fuels. In this regard, UPEI and FETSA insisted on the fact that low-carbon fuels are based on already mature and reliable technologies and can take advantage of existing infrastructure. Thus, the use of sustainable food and feed crop-based biofuels should not be unduly restricted, if all sustainability criteria are met. Since the RED II Directive already provides with measures



to guarantee that high-ILUC-risk biofuels are not taken into consideration for the calculation of the renewable energy targets, sustainable fuels (such as crop-based biofuels with proven sustainability credentials) should be accounted for.

Also on the radar screen of the ITW Commission was the Implementing Regulation on the new Euromarker, published in the EU Official Journal on 17 January 2022. ACCU-TRACE™ PLUS (common fiscal marker for gas oils and kerosene), will replace as of 18 January 2024 the current Solvent Yellow 124. A transitional period is running between 17 January 2022 and 17 January 2024, during which time both markers can be used in parallel. However, this replacement is not “straight forward”: ITW Commission members are monitoring this matter in their respective countries. Questions include how to detect the new marker, how to cope with discrepancies of implementation between the Member States for cross-border sales, how the market will react when batches containing the old marker are mixed with batches containing the new marker. ITW Commission members are liaising with their Ministries of Finance and share experience via the UPEI Google Forum.



– Retail Stations Commission

Chair: Ivan Indráček

The Retail Stations Commission met online in September 2022 and focused its activities on the Alternative Fuels Infrastructure Regulation (AFIR), on the regulation on CO₂ standards for light duty vehicles - which revisions were under discussion in the European Parliament and the EU Council - and on the EU Future Mobility Strategy. At its meeting it also discussed with speakers from Energex Partners Ltd, who presented the outcome of a project carried out for MEW member UTV on (un)security of supply and logistical challenges in the framework of the upcoming EU embargo on Russian oil.

On AFIR, UPEI adopted in March 2022 a position paper, including a set of amendment proposals, based on the consideration that precluding the use of a wide range of technological solutions in light transport means undermining the attractiveness and economic sustainability of investments in low-carbon fuels (liquid and gaseous, of renewable and/or synthetic origin). In the absence of a favourable regulatory environment and a scalable business case, the research and development of all low-carbon fuels risks running aground, also jeopardising the decarbonisation of heavy transport, the maritime, aviation and other hard-to-abate sectors.

In its position, UPEI insisted on the need to bring technological neutrality back to the heart of the "Fit for 55" package as a priority because:

- » It would make it possible to maximise the reduction of climate-changing gas emissions in a cost-efficient way, through the use of all the technologies already available and even new, more performing solutions (for example, CO₂ capture and storage/reuse technologies);
- » It would allow the spread of low-carbon fuels, the costs of which can only be reduced by exploiting economies of scale, or if they can also be used in light transport;
- » It would increase European energy resilience and independence, making it possible to diversify the energy mix and supporting European production value chains;
- » It would be in line with the guidelines, already expressed by the market, aimed at achieving carbon neutrality while retaining European thermic engine technologies, jobs and industrial expertise;
- » It would restore coherence and balance between supply-side policies on alternative fuels and those on the demand side.

Adopting a technologically neutral approach would mean recognising and making the most of the potential of low-carbon fuels, which can fully contribute to the decarbonisation of all sectors, are based on already mature and reliable technologies, can be used in vehicles already in circulation without the need to make any changes (especially in the case of the use of synthetic fuels, chemically identical to their fossil counterparts, but which guarantee over 90% of GHG saving), can take advantage of the existing logistics network and distribution infrastructure, represent an efficient solution for the storage and transport of energy over long distances and even in some cases have a negative carbon balance.

On the revision of the Regulation on CO₂ emission standards for light-duty vehicles, UPEI adopted three texts in the form of a joint letter to policy makers and two joint statements with FETSA.

The joint letter was co-signed by representatives of the car and the car parts industry as well as of the fuel manufacturers and distributors, calling for the European Parliament and the EU Council to, during the trilogue negotiations, fully implement the outcome of the Council General Approach enabling, after 2035, new internal combustion engine vehicles to run on CO₂ neutral fuels and give it a legal and concrete basis in terms of registration of new cars.

Both joint statements with FETSA aimed at proposing to the EU Council and the European Parliament, in the final phase of their respective internal discussions, a limited number of amendments or changes to be brought to the text.

As regards the EU “Future Mobility Strategy”, the Retail Stations Commission considered that a follow up of the European Commission’s public consultation on the transformation of the mobility ecosystem should be monitored, and asked the Secretariat to follow the activities of DG GROW on the mobility, transport, and automotive ecosystem, one of the 14 eco-systems defined by the European Commission in its Industrial Policy Strategy adopted in 2021. In this context, the Secretariat attended the Mobility Transition Pathway Co-Creation event on 28 November, where representatives from public authorities, trade unions, car and rail transport sectors presented solutions in terms of mobility infrastructures and sustainable fuels availability.

Finally, the Retail Stations Commission supervised the development of a regular UPEI enquiry (via the UPEI Forum) on national measures taken to offset increased energy prices on consumers and companies. Presented in the form of an excel sheet, the enquiry covers nineteen countries (Austria, Belgium, Bulgaria, Croatia, Czech Republic, Estonia, Finland, France, Germany, Hungary, Italy, Lithuania, Luxembourg, Netherlands, Poland, Portugal, Slovenia, Spain, Sweden and United Kingdom) and describes eight types of measures: excise duties; VAT; other taxes; vouchers or other price donations; price or margin caps; price monitoring; bio-blending obligations.



– Fuel Payments Commission

 Chair: Ondřej Jančařík

The Fuel Payments Commission met online on 6 June and on 18 November. It essentially focused its activities on the follow-up on the Vega International Case and the future revision of the Payment System Directive – (EU) 2015/2366 or “PSD2”, due in 2023.

The Vega International Case of the EU Court of Justice concerns the question whether the provision of fuel cards is to be treated as a financial activity and, as such, exempt from VAT. Whereas during the first part of the year the European Commission seemed to envisage to implement the Court of Justice ruling in a sense favourable to the fuel cards sector, a working document published in October 2022 by DG TAXUD, while defining two main business models (the buy/sell model and the commissionaire model), gave a different direction to this implementation. In this working document, fuel cards are to be considered as a financial service under the buy/sell model, but as a



purchaser/supplier of fuel delivers goods under the commissionaire one.

At its November meeting, the Fuel Payments Commission agreed to develop a position paper, to send it to the Member States’ relevant authorities and to request a meeting with DG TAXUD. The general objective was to make Members States understand that the Vega International business model does not represent the generally accepted and applied fuel cards business. It was also envisaged to coordinate UPEI’s advocacy activities with Fleet Card Europe (FCE), the European association representing the independent fuel card providers.

Based on numerous requests for a meeting, DG TAXUD organised in November an online conference with all relevant stakeholders to discuss its working paper and agreed upon the creation of a stakeholders group to propose a solution which would not damage the fuel card standard business, while respecting the decision of the EU Court of Justice. UPEI joined this working group that met several times during the winter and submitted a document to DG TAXUD on 19 January 2023.

The Fuel Payments Commission also monitored closely the preparations for the revision of the PSD2, announced for the second quarter of 2023 in the European Commission work programme for 2023.

As preliminary work, the European Commission (DG FISMA) commissioned two consultants to prepare a study to assess the application and impact of the current directive, based on a questionnaire to which UPEI answered in June. The study’s publication was expected for early 2023.

The European Commission also launched three public consultations in the course of the summer. UPEI provided an answer to the “Targeted consultation on the review of the revised payment services Directive (PSD2)”, insisting on the fact that the fuel cards business should remain out of the scope of the new PSD.

To complete this preparatory work, the Commission also examined the answer by the European Bank Authority (EBA) to its call for advice on the matter.

Finally, the Fuel Payments Commission also examined the final guidelines of the European Banking Authority (EBA) on PSD2 limited network exclusions, which aim at clarifying aspects of its application. Special attention was paid to the exclusion of the fuel cards, including how a network of service providers or various goods and services should be assessed to be qualified as limited.

Fuel Payments Commission members agreed to regularly inform each other on national guidelines updates.



– Bunkering Commission

Chair: Erik de Vries

UPEI Expert on Taxation: Inga Tölke

The Bunkering Commission met online on 21 April and on 27 September. Its main areas of work concerned the “Fit for 55” legislative package, particularly the revision of the Energy Taxation Directive (ETD), of the Emission Trading System (ETS) and its extension to the maritime sector, the FuelEU Maritime Regulation, and the contri-



bution of UPEI to the Renewable and Low-Carbon Fuels (RLCF) Value Chain Industrial Alliance set up in 2022.

UPEI produced two position papers on the revision of the Energy Taxation Directive (ETD) :

In the first one issued in March, UPEI suggested a few amendments to the European Commission proposal, based on its conviction that a coherent framework for minimum taxation rates for energy products will help the uptake of cleaner technologies, while supporting businesses and addressing some existing dysfunctionings within the single market. UPEI also welcomed the removal of many of the taxation exemptions from the current ETD, as it will help simplify taxation regimes and will contribute to the development of a real level-playing field. However, UPEI warned against the risks that the removal of some of these exemptions could entail to the greater uptake of renewable or low-carbon fuels, especially in the maritime sector.

In the second one, produced together with FETSA in the framework of the “Energy for the Future” project, UPEI

- » Welcomed the new focus on the energy content of fuels, coupled with a ranking based on their environmental performance, replacing a purely volume-based approach.
- » Called for a more consistent implementation of the ETD at national level.
- » Asked for the promotion of renewable energy sources to be applied also in respect of blended products.
- » Considered that keeping different treatments for certain sectors is still fit for purpose:
 - › Applying targeted reductions to energy products used as heating fuel and electricity, if used by households and vulnerable households.
 - › Maintaining the mandatory tax exemption for energy products supplied for use as fuel for the purposes of navigation.
- » Warned that the imposition of new fiscal costs on EU bunkering, while keeping non-EU bunkering off costs, will incentivise the bunkering of ships outside the EU. These operations are not significantly costly for ship operators and are logistically simple, given the proximity of ports from neighbouring non-EU countries. Furthermore, this could entail a loss of competitiveness of EU ports, since they could lose bunkering volumes in their operations. Consequently, fueling conventional bunker fuels in non-EU ports could become attractive as a cost-containment issue for operators, resulting in direct environmental effect.



- » While supporting an exemption for bunkering fuels, welcomed the inclusion of maritime transport in the revised EU ETS. We are confident that through CO2 pricing, the new system will more adequately incentivise this sector's decarbonisation, without undermining our global competitiveness.
- » Called for LNG to be included under the EMCS (Excise Movement and Control System).

This set of statements was completed by specific amendment suggestions to the relevant articles of the revision proposal.

The Bunkering Commission also monitored very closely the legislative process related to the FuelsEU Maritime Regulation. A close contact was kept with the Rapporteur MEP Jörgen Warborn (EPP, Sweden) and his parliamentary Assistant Filip Bertilsson, whom we met online together with FETSA. Since the draft report prepared by MEP Warborn was in line with UPEI's position paper of October 2021, it was agreed with Mr. Bertilsson that UPEI and FETSA would emphasize their support to the other MEPs.

In parallel, the Bunkering Commission followed the discussions on the revision of the Emission Trading Scheme (ETS), particularly its planned extension to the maritime sector. It is important for UPEI members that the ETS and the FuelsEU Maritime Regulation remain consistent.

At the Secretariat's suggestion, it was agreed that the Bunkering Commission would propose to the Board that UPEI joins the Renewable and Low-Carbon Fuels (RLCF) Value

Chain Industrial Alliance (RLCF), established in April by the European Commission. The purpose of this Alliance coordinated by DG MOVE is to ensure that aviation and waterborne transport industries have access to renewable and low-carbon fuels, while considering the future use of these fuels in road transport, and thus contributing to a reduction in the transport sector's greenhouse gas (GHG) emissions by 90% by 2050. Four topics were defined, to be developed in four respective roundtables on "the availability of feedstocks, synergies among sectors and the so called "just transition", "production pathways and value chain - aviation" / "production pathways and value chain - waterborne transport" and "access to public and private finance".

UPEI applied for membership in the Roundtable related to waterborne transport, which objective is to identify the relevant technology pathways to decarbonise the sector, as well as the enabling conditions and supporting measures to ensure that the production capacities of renewable and low-carbon fuels in the waterborne segment will grow quickly and consistently in Europe, in line with the objectives of the FuelsEU Maritime Regulation. It will also address the obstacles to RLCF mass deployment and production. Our candidate Kathleen Kollewe, Manager, Climate Policy and Communication at our German association member MEW, was selected and started contributing to the work of the Roundtable. The Roundtable will elaborate and provide concrete inputs on the following questions:

- » Establish a common knowledge basis (stocktaking exercise).
- » Launch a mapping exercise of Technology and Commercial Readiness Levels for different Fuel Products.

- » Assess the feasibility of utilisation of different RLCF in the maritime segment as well as the feasibility of defining Sustainable Maritime Fuels (SMF) and developing their value chain.
- » Contribute to the development of a RLCF certification framework compatible with the requirements of the FuelEU Maritime Regulation, including both fuel quality and sustainability certification.
- » Develop Guidance for drafting Fuel Supply Contract templates for Maritime Operators.
- » Help identify a common pipeline of both existing and new investment projects suitable for development and bankable for financing.

At its April meeting, the Bunkering Commission also heard a presentation by Studio Gear Up and the Dutch Platform on Renewable Fuels on “Sustainable Maritime Fuels”, providing an overview of the “Fit-for-55 proposals and their implications”, and focusing on an overview of the proposed legislations, the contradictions between these proposals, and the implications of the different legislations on the demand of renewable fuels.

– Retail Heating Commission

 Chair: Uta Weiss

While no meeting of the UPEI Retail Heating Commission was organised in 2022, UPEI actively contributed to the work of the Joint Heating Commission, established in 2019 together with the ECFD (European Confederation of Fuels Distributors), Eurofuels and Fuels Europe as a cooperation platform to exchange views and define common positions on energy policy topics.

The Joint Heating Commission met on 29 April (and finalised this meeting on 11 May) and on 18 October.

While reviewing the state of discussions of the “Fit for 55” legislative package, it agreed to produce a joint statement, accompanied with several suggestions for amendments, on the revision of the Energy Performance of Buildings Directive (EPBD). The main concerns expressed in the statement were the following:

- » The proposed introduction of an explicit recommendation to Member States to ban fossil fuels-based technical building systems is too broad, as it could lead to the disproportionate and discriminatory ban of low-carbon and renewable fuel technologies, predominately used in low-income households and/or off-grid communi-

- ties, that are already currently fulfilling the decarbonisation objectives and should therefore continue to be allowed, alongside the technology used for them.
- » A more proportionate and effective solution could be the introduction of a narrowly defined, limited ban, only prohibiting the installation of new boilers with emission equivalent or a superior predetermined threshold. This approach would allow a proper level playing field for all clean solutions to contribute to meeting the EU decarbonisation targets, without disproportionately banning fuels and/or technologies which would be able to help meet these objectives, including already available low-carbon and renewable solutions. Another option to consider is to incorporate 65% of renewables with a combination of technology (e.g., hybrid systems) and low-carbon and renewable liquid fuels.
- » The proposed definition of “on-site” is too narrow and de facto excludes several sources of energy such as low-carbon and renewable liquid fuels, creating an unfair distortion and discriminating against consumers which cannot benefit from onsite sources. Furthermore, the definition takes into account only direct emissions when assessing the benefit of on-site renewable energy for additional uses (e.g. mobility), and prevents from the recognition of the real environmental footprint of the energy sources considered and their real decarbonisation potential, in direct contrast with the stated requirement “to calculate the life-cycle global warming potential of new buildings” set out in the Directive.
- » A majority of buildings in rural areas are not connected to the electricity or to the gas grid, and it is technically not feasible or cost-efficient for consumers to rely only on renewable energy produced on-site, such as solar power. To achieve a fully decarbonised building stock by 2050, such buildings should be able to utilise others readily available renewable energy sources produced offsite, in order to be granted the



status of a zero emissions building. Low-carbon and renewable liquid fuels are drop-in fuels: they can be progressively added to the fuel mix without changes to the infrastructure, which guarantees a fair and just transition. Their deployment would be an easy win.

The Joint Heating Commission also discussed regulatory developments at Member States level as regards the restriction of ban of heating oil in new installations.

It heard presentations from members, particularly:

- » The report on feedstock availability, commissioned by CONCAWE to the Imperial College of London. This report did not include e-Fuels or food-feed crops. An interesting figure was imports (up to 50 Mtoe/y biomass vs up to 370 Mtoe/y in total). The Fraunhofer and the Imperial College were preparing a complementary study on the topic. Finally, CONCAWE was also developing a study on the mobilisation of feedstock.
- » The Eurofuel Roadmap towards 2050, looking into future demand for heating oil from different studies. The Roadmap is based on two extreme scenarios (restrictive one - no playing field for low-carbon fuels - and an enabling one where the need to use liquid energy sources is recognised).

It was agreed that, based on the Eurofuel Roadmap, the Joint Heating Commission would prepare a leaflet for the attention of policymakers in view of a potential ban in different countries, and taking into account a somewhat more

positive approach towards heating fuels in the context of the energy crisis - this has also materialised with an increase in the purchase of boilers. The brochure would aim at explaining why we need liquid fuels for heating, what are the new liquid fuels, what will be the offer and the demand in 2050, and what the barriers for deployment (essentially legislative) are.

Finally, the Joint Commission held an exchange of views on EU field tests and the 'Green Fuels Ready Label'.



– Oil Stocks Directive revision

**UPEI expert on Oil Stocks:
Maximilian Brockmann**

UPEI was approached by consultants Trinomics and Insights Global, who have been contracted by the European Commission DG ENER to produce a study on a future review of Directive 2009/119/EC on Emergency Oil Stocks, taking into account the European Green Deal and the "Fit for 55" objectives, the 2017 conclusions of the mid-term evaluation of the Directive, the lessons learnt from the COVID-19 pandemic and the current energy crisis. The study could nurture a future formal evaluation or impact assessment of the Directive.

In its answer, UPEI recalled that the EU's security of supply must be guaranteed by ensuring that a wide range of stocks, including for new, renewable energies, can be made avail-





able in case of shock. Less products mean less flexibility in case of an emergency. Furthermore, it could become more difficult or expensive to find adequate storage for specific products (not every product can be stored in every tank storage). UPEI added that we consider it is necessary to keep the commercial and strategic stocks separate in order to prevent conflicting interests between commercial opportunities and legal necessities. On a more general level, it would be very helpful to have a clear outlook on the compulsory stocking obligations (CSOs) for "future energy" products, which could help national authorities to tender long-term contracts.

Oil Coordination Group

For the first time, the European Commission invited in December a number of relevant stakeholders to attend a meeting of the Oil Coordination Group set up under the Directive (Article 17) on Emergency Oil Stocks. This Group is composed of Member States officials and chaired by the European Commission. Its mission is to contribute to analysing the situation within the EU with regard to security of supply for crude oil and petroleum products and to facilitate the coordination and implementation of measures in that field, in particular in the event of difficulties arising in the supply of crude oil and petroleum products.

Whereas many stakeholders were invited to attend, only a few, representing the refining, logistics and storage and distribution sectors, including UPEI, were invited to make

a presentation. It was based on a set of questions sent in advance, related to the evolution of fuels demand and supply in the EU since March 2022 and the perspectives for the next months, and to issues related to logistics, cybersecurity, or management of emergency oil.

PARTICIPATING IN EU INSTITUTIONS MEETINGS

Beyond those already mentioned in the previous paragraphs, UPEI is a member of several expert groups set up by the European Commission and attends their meetings on a regular basis, including the Excise Duties Group, the Trade Contact Group, the Union Database for Biofuels Pilot Focus Group, the Clean Hydrogen Alliance Mobility Roundtable and the Sustainable Transport Forum. UPEI also attended the EU Annual Stakeholders Webinar on 2022 Energy Prices and Costs and a series of meetings organised by the European Commission (Rules for the production of RFNBOs, Vega International Case) or by stakeholders' coalitions with Members of the European Parliament or officials from the European Commission or Permanent Representations.

CONTRIBUTING TO EUROPEAN STANDARDISATION

👤 CEN/TC 19
Expert: Uta Weiss, Fuel quality and biofuels

👤 CEN/TC 441
Expert: Teresa Seyers, Fuels Labelling

UPEI is a Liaison Organisation of the CEN/TC 19, dealing with gaseous and liquid fuels, lubricants and related products of petroleum, synthetic and biological origin, and plays an active role in the working groups on specification for unleaded petrol (21), specification of distillate fuels (24) and on new fuels (38). UPEI is active in WG21 / WG 24 via our representative Ulrich Nowak (MEW). Activities of WG21 include EN 228 and more specifically EN228 E10+. Activities of WG 24 include EN590, EN14214, test methods and abrasive particles.

UPEI is also a Liaison Organisation of the CEN/TC441, a project committee that develops standards providing a harmonised identifier of marketed liquid and gaseous fuels. Marketed fuels include petroleum-derived fuel blends, synthetic fuels, biofuels, natural gas, petroleum gas and biogas-based fuels and hydrogen delivered to non-stationary applications.

UPEI'S ENGAGEMENT ACTIVITIES 2022

9

MEETINGS
with European
Institutions

(stakeholders meetings, workshops
and bilateral meetings)



16

STAKEHOLDERS
we have
interacted with



18

**JOINT
INITIATIVES**
with industry
partners

(joint statements,
publications etc)

11

**CONFERENCES,
SEMINARS,
WORKSHOPS**

(events attended as UPEI)



UPEI REVIEWED 2050 VISION

UPEI published in 2019 its Vision for 2050. Now, the major shocks that have affected the global energy system over the last three years, particularly the COVID 19 pandemic and the invasion of Ukraine by Russia, combined with the fact that no improvement has been measured yet on the climate evolution, required an even more coordinated approach to promote the energy transition towards a more sustainable, resilient, and affordable energy system. Keeping this idea in mind, UPEI reviewed its 2050 Vision, highlighting the major contribution which our sector of the energy supply chain can and will make to support the Europeans to operate in the carbon-neutral economy and society.

Our infrastructure is ready to deliver many alternative fuels to all consumers at affordable prices. To do so, a major condition to attract public and private investment, is to promote the support of policymakers, particularly at EU-level, making sure technology neutrality is guaranteed by further supporting hydrogen, encouraging existing infrastructures, ensuring legislative clarity, establishing a smart energy taxation system, and integrating the social dimension in the transition. We need therefore to understand first:

- » What has changed since 2019?
- » How can the European Independent Fuel Suppliers contribute to solving the challenges posed by these new developments?
- » What UPEI's Members expect from the EU and Member States policy makers?

All these elements are developed in UPEI's reviewed vision.



UPEI & FETSA PROJECT “ENERGY FOR THE FUTURE”

UPEI, together with our partner association FETSA (Federation of European tank storage association), and with the support of our Member MEW (Mittelständische Energiewirtschaft Deutschland) set up the «Energy for the Future» Project in 2022, which aims at increasing our EU advocacy actions to further promote and accelerate the energy sector transition towards carbon neutrality.

The Project receives the advice of Weber Shandwick, with whom UPEI has partnered for many years to advance its advocacy files.

Set to run until March 2024, this project supports UPEI and FETSA efforts to strengthen their contribution to EU decision-making by focusing on topics of common interest ahead of the current political developments and challenges.

In particular, the scope of the initiative covers a wide range of topics, such as:

- » Oil Stocks Directive review
- » Energy Taxation Directive (ETD)
- » EU Taxonomy
- » Revision of the Renewable Energy Directive (REDIII)
- » Revision of the Emission Trading System (ETS), includ-

- ing maritime and buildings/transport
- » Revision of the Alternative Fuels Infrastructures Regulation (AFIR)
- » Revision of regulation on CO2 standards for light-duty vehicles
- » Revision of regulation on CO2 standards for heavy-duty vehicles
- » FuelsEU Maritime
- » Euro 7
- » Green Deal Industrial Plan
- » ReFuelEU Aviation
- » Carbon Removal

The Projects’s Steering Committee is the body that provides a strategic approach to the pieces of legislation above-mentioned, supervising the work programme by advising the managers of the project. It is composed of the Presidents and Managing Officers of the three associations. On a regular basis, it also updates the priorities and the guidelines set to strengthen UPEI and FETSA’s engagement with the EU institutions.

For UPEI, the adoption of common position papers remains under the final approval of our Board.

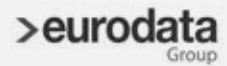


UPEI BUSINESS PARTNERSHIP

In the ongoing energy transition towards a more sustainable, resilient, and affordable energy sector, UPEI noticed how important it is for companies and fuel businesses to have a presence in Brussels with access to a broad range of expertise from within the independent energy sector as well as related sectors. In order to respond to this need, UPEI launched its Business Partnership (BP) in 2017, with the aim to bring together forward-thinking companies which are directly or indirectly involved in the fuel supply sector and which support UPEI mission.

In 2022, UPEI engaged with 15 Business Partners (BPs), offering them several opportunities to learn about the latest European policy developments, join meetings with guest speakers and key players in the industry, meet their peers and extend their network.

UPEI'S BUSINESS PARTNERS



UPEI PARTICIPATION IN STAKEHOLDERS AND EU INSTITUTIONS WORKING GROUPS

UPEI PARTICIPATION IN THE FOLLOWING **STAKEHOLDERS** WORKING GROUPS



INFORMAL COALITION
ON SUSTAINABLE &
RENEWABLE FUELS

MOBILITY
FOR PROSPERITY IN
EUROPE (MPE)

SUSTAINABLE MOBILITY
EUROPEAN PLATFORM

INFORMAL COALITION
ON DELEGATED ACTS
ON RED II

UPEI PARTICIPATION IN THE FOLLOWING **EUROPEAN INSTITUTIONS** WORKING GROUPS



SUSTAINABLE TRANSPORT FORUM

DATABASE FOR BIOFUELS
PILOT FOCUS GROUP

EUROPEAN CLEAN
HYDROGEN ALLIANCE

TRADE CONTACT GROUP

EXCISE DUTIES CONTACT GROUP

RENEWABLE AND LOW-CARBON
FUELS VALUE CHAIN
INDUSTRIAL ALLIANCE

UPEI PUBLICATIONS ISSUED IN 2022

DOCUMENTS

- » UPEI Reviewed 2050 Vision

STATEMENTS

APRIL

- » Joint UPEI-FETSA Statement: Revision of CO2 Emission Performance Standards for new cars and vans

MAY

- » Joint UPEI-FETSA Statement: Revision of the Renewable Energy Directive (RED III)

JUNE

- » Joint UPEI-FETSA Statement: Revision of CO2 Emission Performance Standards for new cars and vans

JULY

- » Joint statement of the EU industry: Pragmatic regulatory framework necessary for hydrogen market

SEPTEMBER

- » Joint Letter to European Policymakers on CO2 Standards for new Cars and Vans

DECEMBER

- » Joint Statement on the importance of industrial CCU for reaching climate neutrality
- » Joint Statement on the Energy Performance of Buildings Directive (EPBD)

POSITION PAPERS

MARCH

- » UPEI Position: Energy Taxation Directive
- » UPEI Position: Amendments to AFIR Revision

JUNE

- » UPEI Position Paper on RED II Delegated Acts
- » Revision of CO2 Emission Performance Standards for new Cars and Vans

SEPTEMBER

- » Position Paper on the European Commission proposal for a Regulation on an emergency intervention to address high energy prices COM(2022) 473 final

OCTOBER

- » UPEI-FETSA Position Paper: Recast of the Energy Taxation Directive (ETD)

DECEMBRE

- » Letter of concern about the European Parliament's position on Article 26 of the proposal for a revision of the Renewable Energy Directive (RED III)

CONSULTATIONS

JULY

- » UPEI answer to the review of the revised payment services Directive (PSD2)

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2022

UPEI ANNUAL REPORT

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